

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA,

v.

22-CV-

\$530,838.57 UNITED STATES CURRENCY  
SEIZED FROM JP MORGAN CHASE  
BANK, N.A. TOTAL BUSINESS CHECKING  
ACCOUNT ENDING IN 1033, HELD IN THE  
NAME OF ALLURE TECHNICAL SERVICE, INC.,

Defendant.

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**VERIFIED COMPLAINT FOR FORFEITURE**

The United States of America, by its attorneys, Trini E. Ross, United States Attorney for the Western District of New York, James P. Kennedy, Jr., Assistant United States Attorney, of counsel, for its verified complaint herein alleges as follows:

**INTRODUCTION**

1. This is an action *in rem* for the forfeiture of \$530,838.57 in United States currency (hereinafter referred to as the “defendant currency”), seized from JP Morgan Chase Bank, N.A. Total Business Checking account ending in 1033, held in the name of Allure Technical Service, Inc., and is subject to forfeiture under the provisions of Title 18, United States Code, Section 981(a)(1)(A) and Title 19, United States Code, Section 1621, as property involved in money laundering transactions or traceable to such property, and Title 18, United States Code, Section 981(a)(1)(C), Title 28, United States Code, Section 2461(c) and Title 19, United States Code, Section 1621, as any property, real or personal, which constitutes or is derived from proceeds traceable to any offense constituting “specified unlawful activity” (as

defined in section 1956(c)(7) of this title and hereinafter referred to as “SUA”), to include violations of Title 18, United States Code, Sections 1343 and 1344 (wire and bank fraud).

2. The jurisdiction of this Court is invoked pursuant to Title 28, United States Code, Sections 1345, 1355, and 1395. Venue is properly premised in the Western District of New York pursuant to Title 28, United States Code, Section 1395.

3. The defendant currency was seized pursuant to a Federal Seizure Warrant on or about June 22, 2022. The defendant currency was converted to a check and deposited into an account under the custody of the United States Marshals Service (“USMS”), Buffalo, New York, and is held within the jurisdiction of this Court.

### **FACTS**

4. The facts and circumstances supporting the forfeiture of the defendant currency are contained in the Affidavit of Federal Bureau of Investigation (“FBI”) Special Agent Chad W. Artrip, a copy of which is attached hereto as Exhibit 1 and incorporated as though fully set forth herein, and has been provided to the Court with an application that it remain under seal until further Order of the Court.

### **CONCLUSION AND RELIEF REQUESTED**

5. The government submits that the defendant currency is subject to forfeiture to the United States of America pursuant to Title 18, United States Code, Section 981(a)(1)(A) as property involved in money laundering transactions or property traceable to such property. In addition, the defendant currency constitutes proceeds or were derived from proceeds traceable to SUA, namely wire and bank fraud in violation of Title 18, United States

Code, Sections 1343 and 1344, and is therefore subject to forfeiture pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c).

WHEREFORE, the United States of America respectfully requests that:

- (1) that an arrest warrant *in rem* be issued for the arrest of the defendant currency;
- (2) that notice of this action be given to all persons known or thought to have an interest in or right against the defendant currency;
- (3) that a judgment be entered declaring the defendant currency be condemned and forfeited to the United States of America for disposition in accordance with the law;
- (4) that the costs of this suit be paid to and recovered by the United States of America; and
- (5) that the Court grant such order and further relief as deemed just and proper.

DATED: November 17, 2022  
Buffalo, New York.

TRINI E. ROSS  
United States Attorney  
Western District of New York

BY: s/JAMES P. KENNEDY, JR.  
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STATE OF NEW YORK     )  
COUNTY OF ERIE         ) ss.:  
CITY OF BUFFALO         )

CHAD W. ARTRIP, being duly sworn, deposes and says:

I am a Special Agent with the Federal Bureau of Investigations, and I am familiar with the facts and circumstances surrounding the forfeiture action against \$530,838.57 in United States currency (hereinafter referred to as the “defendant currency”), seized from a JP Morgan Chase Bank, N.A. Total Business Checking Account ending in 1033, held in the name of Allure Technical Service, Inc. The facts alleged in the Complaint for Forfeiture are true to the best of my knowledge and belief and were obtained during the course of the investigation of the defendant currency and provided to the United States Attorney’s Office.

s/CHAD W. ARTRIP  
Chad W. Artrip  
Special Agent  
Federal Bureau of Investigation

Subscribed and sworn to before  
me this 17<sup>th</sup> day of November,  
2022.

s/GABRIELA KICK  
Notary Public

**GABRIELA KICK**  
Notary Public, State of New York  
Qualified in Niagara County  
My Commission Expires: 09/04/2026